

Rogers et al. v. U.S. Dept. of Health & Human Servs. et al.
Civil Action No. 6:19-cv-01567-JD

Exhibit B

**to the State Defendants' Reply in Support of the Motion to Stay
Discovery and Hold Pending Discovery Motions in Abeyance**

Excerpts from the Deposition of Lauren Staudt

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

EDEN ROGERS and

BRANDY WELCH,

Plaintiffs,

vs.

CASE NO. 6:19-cv-01567-TMC

UNITED STATES DEPARTMENT OF HEALTH
AND HUMAN SERVICES;
ALEX AZAR, in his official capacity as SECRETARY of
the UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
ADMINISTRATION FOR CHILDREN AND FAMILIES;
LYNN JOHNSON, in her official capacity as ASSISTANT
SECRETARY of the ADMINISTRATION FOR CHILDREN AND
FAMILIES;
SCOTT LEKAN, in his official capacity as PRINCIPAL
DEPUTY ASSISTANT SECRETARY of the ADMINISTRATION
FOR CHILDREN AND FAMILIES;
HENRY MCMASTER, in his official capacity as
GOVERNOR of the STATE OF SOUTH CAROLINA;

MICHAEL LEACH, in his official capacity as STATE
DIRECTOR of the SOUTH CAROLINA DEPARTMENT OF SOCIAL
SERVICES,

Defendants.

VIDEOTAPED

DEPOSITION OF: LAUREN COLLINS STAUDT
(APPEARING VIA VIRTUAL ZOOM)

DATE: June 4, 2021

TIME: 9:05 AM

REPORTED BY: TERRI L. BRUSSEAU
(APPEARING VIA VIRTUAL ZOOM)

1 When you were talking earlier about the
2 different types of support that a CPA provides
3 during the application process, there are things a
4 CPA does before a family is licensed -- before a
5 child is placed in a home and there's -- there's
6 support, there's things after that point, right?

7 A. Yes.

8 Q. For all the things that happened
9 before, the recruiting, the awareness in the
10 community, activities, helping instill home
11 inspection, even helping out a family to fill out
12 paperwork if that's -- for all of those things,
13 just the pre-license aspect of it, CPAs never get
14 reimbursed or funded by the state or federal
15 government for any of those activities, do they?

16 A. Not -- no, not that I'm aware of. I
17 don't know about the federal government, but not as
18 far as DSS.

19 Q. Okay. And during that -- that process
20 of -- we've sort of defaulted to call it
21 recruiting, but whether it's generating interest or
22 awareness in the community, encouraging people to
23 consider becoming foster parents, throughout that
24 process and then the process of helping to do the
25 home study, helping someone get to the point of

1 applying for licensure, I think you said that all
2 private CPAs provide this support or I think you
3 said they should, is that right?

4 COURT REPORTER: I'm sorry, I didn't
5 hear an answer.

6 THE WITNESS: Yes. Sorry.

7 BY MR. COLEMAN:

8 Q. And then after a -- an individual or
9 couple or family is licensed as a foster parent or
10 foster family and a child is placed in their home
11 by DSS, all CPAs provide ongoing case management
12 and support in that way too, right?

13 A. Yes.

14 Q. I think you said some CPAs might be
15 bigger, some might be smaller, but they all have
16 to -- have to provide comfortable types of support
17 to the individuals or families that they're working
18 with, right?

19 A. Correct.

20 Q. When you were talking earlier about
21 some of the services that CPAs provide to licensed
22 foster families that are associated or affiliated
23 with them, you mentioned that they do quarterly
24 visits, they might provide training, they could
25 help arrange doctors appointments or transportation

1 or things like that, right?

2 A. Yes.

3 Q. And then a little bit after that there
4 were -- there was some sort of discussion about
5 what those things were, but then you were asked
6 does SCDSS provide those kinds of support.

7 I want to -- I want to make sure I
8 understand that, right, because if a family is
9 working not with a CPA but is directly with SCDSS,
10 does SCDSS provide a quarterly visit?

11 A. Yes.

12 Q. Okay. And I know, for example, that
13 SCDSS can provide transportation services. That's
14 right, isn't it?

15 A. Yes.

16 Q. Does SCDSS provide any sort of
17 ongoing -- I don't know if it's annual or -- but
18 any sort of training or additional continuing
19 education for foster parents?

20 A. Yes.

21 Q. So SCDSS provides it sounds like
22 comparable types of ongoing support that you had
23 described that private CPAs provide, is that right?

24 A. That's correct.

25 Q. I'm going to look for a moment at the